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December 7, 2021

Via ECF

Honorable Sean H. Lane
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: White Plains Healthcare Properties I, LLC v. HBL SNF, LLC,
Case No. 21-07096 (SHL)

Dear Judge Lane:

We write on behalf of White Plains Healthcare Properties I, LLC (the “Landlord”) in connection with the above adversary proceeding (the “Action”). We write to notify the Court that the parties have conferred and agreed on a limited discovery schedule as follows:

- the parties will produce documents on December 29, 2021 responsive to the demands already exchanged;
- the deposition of Howard Fensterman will take place on January 11, 2022; and
- the deposition of William Nicholson will take place on January 12, 2022.

These dates are subject to a mutually agreeable short adjournment, if necessary, to accommodate holiday schedules.

As discussed with the Court today, counsel for both parties have also agreed that during the court conference already scheduled for January 13, 2022, the parties will schedule a hearing date for the motion for summary judgment in the Action.

Respectfully submitted,

/s/ Alfred E. Donnellan
Alfred E. Donnellan

cc: All counsel by ECF